

CAIN & HERREN, ALC
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Attorneys for Debtor BRANT KEMEL JACKSON

UNITED STATES BANKRUPTCY COURT

DISTRICT OF HAWAII

IN RE:

BRANT KEMEL JACKSON,

Debtor

Case No. 19-01655

(Chapter 13)

AP No. 20-90009

**DEBTOR'S OPPOSITION TO
MOTION FOR RULE 9011
SANCTIONS**

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SANCTIONS**

AND NOW, Comes Debtor BRANT KEMEL JACKSON, by and through his attorneys, CAIN & HERREN, ALC, and opposes PLAINTIFF/CREDITOR'S MOTION FOR RULE 9011 SANCTIONS, which was filed on October 13, 2020, Dkt. 31.

In re: BRANT KEMEL JACKSON

Case No. 19-01655 (Chapter 13)

OPPOSITION TO MOTION FOR RULE 9011 SANCTIONS

This motion should be denied because Plaintiff failed to follow the 21-day procedure provided for by rule 9011(c)(1)(A). In the alternative, the motion should be denied because Debtors are entitled to defend summary judgment motions and to defend them is not baseless or frivolous.

This objection is brought pursuant to 9011(c)(1)(A) of the Federal Rules of Bankruptcy Procedure and is supported by a Memorandum of Law, a Declaration of Michael J. Collins.

WHEREFORE, Debtor BRANT KEMEL JACKSON respectfully requests that this Honorable Court DENY PLAINTIFF/CREDITOR'S MOTION FOR RULE 9011 SANCTIONS and award Cain & Herren, ALC, attorneys fees and costs for defending this motion pursuant to Rule 9011(c)(1)(A).

DATED: Wailuku, Maui, Hawaii, Thursday, October 15, 2020.

CAIN & HERREN, ALC

/s/ Michael J. Collins

Michael J. Collins, Esq.

Attorneys for Debtor

BRANT KEMEL JACKSON

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Case No. 19-01655 (Chapter 13)

OPPOSITION TO MOTION FOR RULE 9011 SANCTIONS